

## **EXHIBIT B**

Charles Sweeney

11/21/2006

UNITED STATES DISTRICT  
DISTRICT OF MASSACHUSETTS

Civ. Action No. 04-10294 DPW

DEBORAH CHIN, individually and on  
behalf of all others similarly  
situated,

Plaintiff,  
vs.  
SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. AND STEPHEN NILL,

Defendants.

/

DEPOSITION OF CHARLES SWEENEY

November 21, 2006  
Wyndham Hotel  
8100 International Drive  
Orlando, Florida 32819  
9:27 a.m. - 12:29 p.m.

Reported by:  
Lori Junker, RPR  
Notary Public, State of Florida

1 strike that.

2 At the time that you authorized the  
3 commencement of this litigation asserting fraud  
4 claims against Sonus Networks, Hassan Ahmed and  
5 Stephen Nill, what was your basis for the assertion  
6 of fraud?

7 A You know, the recommendation of counsel.

8 Q Other than what counsel's recommendation  
9 may have been, were you aware of any facts that  
10 supported the assertion of a fraud claim against the  
11 defendants?

12 A Well, there were restatements involved in  
13 financial statements. There were disclosures that  
14 had been made as I understand it that were not  
15 accurate.

16 Q And is there anything that you're aware of  
17 with respect to those two items that you just  
18 identified that provide a factual basis for asserting  
19 fraud?

20 A I don't think I'm in a position to answer  
21 the question. I am not sure what a factual basis is.

22 Q Well, in your experience as a CPA does the  
23 fact that a company may restate its financials mean  
24 that the restatement is as a result of fraud at the  
25 company?

Page 82

1 MR. CERA: Object to the form.

2 THE WITNESS: Not necessarily.

3 BY MR. MATULE:

4 Q **And so I'll ask you to answer my question**  
5 **one more time.**

6 MR. CERA: I think he's answered it.

7 BY MR. MATULE:

8 Q **Sir, are you sitting here today or at the**  
9 **time that you authorized the filing of this lawsuit**  
10 **and other than you've already testified, are you**  
11 **aware of any facts that would support the claim of**  
12 **fraud in this case?**

13 MR. CERA: Asked and answered.

14 THE WITNESS: I guess I would ask the  
15 question: What facts are required to establish  
16 fraud that might assist me to answer that  
17 question?

18 BY MR. MATULE:

19 Q **Well, if you like, you can take a break**  
20 **and talk to your counsel about the legal requirements**  
21 **for a fraud claim. Would you like to do that?**

22 MR. CERA: Well, I think he's already  
23 testified that he's relied, at least in part, on  
24 the recommendations and work of counsel. I  
25 think he's answered your question. Do you have